

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Leonard Miree Jr

CHAPTER 13

CASE NO. 19-50372-MAR

JUDGE MARK A RANDON

Debtor

/

TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee requests documentation to support debtor's request to excuse \$2,900.00 in Plan payment delinquency.
2. Where debtor's proposed Plan payments are greater than debtor's best effort as indicated on Schedule J, Trustee questions the feasibility of the 1st Amended Chapter 13 Plan pursuant to 11 U.S.C. §1325(a)(6). Trustee notes that the last plan payment received was on November 25, 2019.
3. Trustee requests that debtor counsel submit a stipulation to update the Payment Order using the form available on the Trustee's website to provide for payment via TFS.
4. The Trustee objects to counsel's failure to serve the 1st Amended Chapter 13 Plan on all creditors on the current Court Mailing Matrix as required by E.D. Mich. LBR 3015-2(a)(2)(B) as the Matrix attached to the Proof of Service is dated August 14, 2019.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

Dated: January 03, 2020

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARGARET CONTI SCHMIDT

Krispen S. Carroll (P49817)

Margaret Conti Schmidt (P42945)

719 Griswold Street, Ste 1100

Detroit, MI 48226

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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

HENSEL LAW OFFICE, PLLC
36250 DEQUINDRE RD
STE 410
STERLING HEIGHTS, MI 48310

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

Leonard Miree Jr
53200 Odilon
Shelby Township, MI 48316

January 03, 2020

/s/ Barb Ecclestone

BARB ECCLESTONE

For the Office of the Chapter 13 Trustee-Detroit
719 Griswold Street, Ste 1100
Detroit, MI 48226
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